

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

ADAMOU DJIBO

**AFFIDAVIT OF ADAMOU DJIBO
IN SUPPORT OF DEFENDANT'S
MOTION TO SUPPRESS**

15 Cr. 88 (SJ)

STATE OF NEW YORK)
) ss.
COUNTY OF KINGS)

ADAMOU DJIBO, being duly sworn, does hereby swear and affirm that the following is true under penalties of perjury:

1. My name is Adamou Djibo. I am the defendant in the above-captioned case.

2. I submit this affidavit on the advice of my lawyer in support of motions to suppress (1) a statement made by me after my arrest and (2) any data contained on any of the electronic devices federal agents claim to have seized in the course of my arrest. The following is based on my best recollection of the circumstances of my arrest.

3. I was born in Togo, West Africa. I am a lawful permanent resident of the United States. I live in ^{East} ~~West~~ Hartford, Connecticut with my ^{common-law} wife and five children. I work as a businessman exporting automobiles to Africa.

*and (3) any
investigative
fruits
thereof.*

4. On February 3, 2015, I was travelling to London, England on the way to Togo. At about 9 p.m., as I was boarding my flight at John F. Kennedy International Airport, I was stopped by plain-clothes officers or agents who claimed to be from the Department of Homeland Security (the "Agents"). I was detained by the Agents and taken to a separate room in the airport terminal. I was forced to miss the flight I was boarding. I was not allowed to leave that room. In the room, I was questioned and my things were searched.

5. I was forced to strip naked to be searched.

AD 6. The Agents forced me to provide passwords to the ^{iPhone} ~~mobile telephones~~ I had with me.

7. I did not consent to any search or questioning.

8. I was never told that I was free to leave.

9. I wanted to leave to catch my flight but I was not allowed to do so.

AD 10. The Agents searched through each of ^{three} ~~three~~ cellular phones I had on me.

11. After the questioning and the search ended, the Agents told me that I had the right to remain silent and the right to an attorney. I immediately told the officers that I did not want to speak to them and that I wanted to speak to an attorney. Only then did the

AD questioning ~~and the search~~ end.

12. The foregoing is true and correct to the best of my knowledge and recollection.

-as well
as my
iPad
and
SIM
cards.

Dated: New York, New York
June 25, 2015


Adamou Djibo

On 6/29/15, before me, the undersigned Notary Public of the State of New York, personally appeared Adamou Djibo, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacities, and that by his signatures on the instrument, the individual executed the instrument.


Notary Public
State of New York